

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

LORENZO GUARINO,
Plaintiff,

v.

[CIVIL ACTION NO. 04-10246]

R. W. GRANGER & SONS, INC. et. al
Defendants

Now comes the plaintiff and supplements his response to discovery order of May 25, 2004 and responds to this Honorable Court's discovery order of June 23, 2006 as follows:

(a). Individuals with Discoverable Information regarding Plaintiff's Claims:

1. In addition to those individuals previously identified, the following individuals may have knowledge of facts relevant to the claims and defenses asserted in this matter:

f. Melissa Hicks: 5 Eastern Avenue, East Providence, Rhode Island. It is believed that Ms. Hicks has knowledge of the site conditions on the project as they existed prior to the plaintiff's accident.

g. Keith Cabral: address unknown. Mr. Cabral was a co-worker of the plaintiff on the project. Upon information and belief, Mr. Cabral took photographs of the scene, copies of which have been produced to the defendant Granger.

h. Albert J. Sabella: 115 Ceader Street, Providence, Rhode Island 02903. Mr. Sabella performed a vocational assessment on Mr. Guarino.

i. Anthony K. Teebagy, M.D. Lahey Clinic Lexington, Ma.: Dr. Teebagy did a medical evaluation on the plaintiff as a second opinion.

(b). In addition to the the documents previously produced, the plaintiff attaches hereto additional documents obtained through discovery. The plaintiff also agrees to provide each defendant with executed HIPPA compliant medical records.

RESPECTFULLY SUBMITTED,
PLAINTIFF,

BY HIS/HER ATTORNEY

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